



# city of san luis obispo

Community Development Department • 919 Palm Street, San Luis Obispo, CA 93401-3218

May 3, 2013

Airport Land Use Commission  
c/o Bill Robeson  
County Planning and Building  
County Government Center  
San Luis Obispo CA 93408

SUBJECT: Airport Land Use Plan Update

Chairperson Oxborrow and Commissioners:

At the last Airport Land Use Commission meeting, the Commission requested that Mr. Robeson provide a "punch list" of Airport Land Use Plan items that should be addressed as part of an update effort. In preparation for the Commission's discussion at previous meetings, the City of San Luis Obispo provided comments regarding topics of concern (i.e. location of safety zones and associated land use restrictions, airport operations forecast and noise contours, etc.). The attached table is meant to assist in the Commission's understanding of how those topics of concern manifest within the Airport Land Use Plan itself and identifies those sections for which amendments are proposed.

The City of San Luis Obispo requests the Airport Land Use Commission take this opportunity to revise the San Luis Obispo County Regional Airport Land Use Plan to address the items in the attached list. City staff is committed to working with the Commission through the update process and we respectfully request that the Commission consider the City's requests.

The City looks forward to continued collaboration with the Commission.

Sincerely yours,

Kim Murry, Deputy Director  
Community Development Department

CC: San Luis Obispo City Mayor and Council  
San Luis Obispo County Board of Supervisors

Attachment

City of San Luis Obispo  
AIRPORT LAND USE PLAN UPDATE COMMENTS  
Prepared May 1, 2013

**Purpose:** The San Luis Obispo County Regional Airport Land Use Commission (“ALUC” or “Commission”) is developing an Update to the San Luis Obispo County Regional Airport (“SPB” or “Airport”) Airport Land Use Plan (“ALUP”) and the City of San Luis Obispo is providing specific comments to the ALUC for their consideration during the ALUP Update. These comments reference two key ALUC documents:

1. Airport Land Use Plan for the San Luis Obispo County Regional Airport, The Airport Land Use Commission of San Luis Obispo County, Adopted December, 1973, Amended June 19, 2002, July 21, 2004, May 18, 2005.
2. Dimensional Detail of Airport Safety Zones, Airport Land Use Plan, San Luis Obispo County Regional Airport with suggested modifications for 2013, January 25, 2013 (Not Adopted by ALUC).

The City’s comments are supported by several key reference documents and analyses. These include:

1. California Public Utilities Code, Section 21670-21679.5.
2. California Airport Land Use Planning Handbook, 2011.
3. San Luis Obispo County Regional Airport Master Plan, 2004.
4. San Luis Obispo County Regional Airport, FAA-Approved Airport Layout Plan (ALP), 2010/2012.
5. Final EA/EIR, San Luis Obispo County Regional Master Plan Update, July 2006.
6. FAA Terminal Area Forecast, Fiscal Years 2012 to 2040, January 2013.
7. FAA “Review and Approval of Aviation Forecasts,” June 2008;  
([http://www.faa.gov/airports/planning\\_capacity/media/approval\\_local\\_forecasts\\_2008.pdf](http://www.faa.gov/airports/planning_capacity/media/approval_local_forecasts_2008.pdf))

Table 1 provides a series of ALUP references and comments associated with these sections. Also provided is the proposed resolution to these comments consistent with the key references listed above. The City’s representatives are immediately available to discuss and resolve these comments with the ALUC and its staff.

**Table 1**  
**San Luis Obispo County Regional Airport**  
**ALUP Comments by the City of San Luis Obispo**

<b>ALUP Reference</b>	<b>Comment</b>	<b>Proposed Resolution</b>
1. Section 2.3	Geographic area encompassed by the ALUP is not specifically defined and there is no definition for the basis of the Plan’s geographic coverage.	Define the Plan’s geographic coverage using the FAA’s FAR Part 77 Horizontal Surface associated with Runway 11-29 (also used for Caltrans Handbook Zone 6 – Traffic Pattern) and as mapped using GIS as the horizontal limits of the Plan. Update the general written description in Section 2.3 to reflect this change.

**Table 1**  
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2. Section 2.5.2.1	The policy of the ALUC is to “require voluntary review of proposed major individual development projects”.	Delete the word “voluntary” and use “advisory” instead. The review is either required or is advisory in nature. Clarify other language in section. Review of structures listed in subsection f may be subject to FAA review for airspace obstruction in certain locations but in other locations, this is outside of the ALUC purview.
3. Section 2.8.1	Redevelopment which includes additional residential density is restricted within the 55 dB airport noise contour. This is inconsistent with City General Plan.	Update to reflect urban noise limits.
4. Section 3	Table 1: Projected Annual Airport Activity Forecasts is outdated and substantially inconsistent with the FAA’s Terminal Area Forecast (TAF).	Develop a reasonable 20-year forecast of annual airport activity consistent with the FAA’s airport planning and activity forecasting guidelines.
5. Section 4.2	Policy G-2 appears to be overly broad and allows the ALUC to make a finding of inconsistency even if a project meets all ALUP conditions and restrictions.	Add requirement for the ALUC (when making a finding of incompatibility based on this policy) to provide specific findings documenting the incompatibilities that lead to a finding of inconsistency.
6. Section 4.3.1	Definition of the Airport environment as “quiet, rural” is inconsistent with the portions of the airport influence area (AIA) within the City limits and properties slated for annexation by the City.	Properly characterize those portions of the AIA within the existing City limits and properties slated for annexation by the City. Designate the City and areas identified for annexation as “Urban” for airport land use planning purposes. Consistency with Noise Element of the City’s General Plan is appropriate versus ALUP imposing 55 dB as requirement. Handbook indicates that between 60-70 dB reflects Urban low to medium high density residential noise levels.
7. Section 4.3.2.1.a	Extremely Noise Sensitive Land Uses definition as “all residential land uses” is excessive and not supported by fact.	Specify those residential land uses that qualify as “extremely” noise sensitive versus those that are “moderately” or just “noise sensitive.” Provide full basis for determinations consistent with federal law, State law and the Caltrans Handbook guidelines.
8. Figure 1	Noise contours based on noise study by Brown, Buntin Associates, April 2001 that is not available for review. Basing noise contours on “runway capacity” is excessive and unsupported as possible within any reasonable planning horizon for the Airport as evidenced by the FAA’s Terminal Area Forecast through 2040. The Airport Master Plan Forecast is also out of date and out of compliance with the FAA Master Plan guidelines in Advisory Circular 150/5070-6B Airport Master Plans and FAA’s “Review and Approval of Aviation Forecasts,” June 2008.	Update noise contours to be consistent with updated aviation activity forecast. Until such time as a new forecast and noise study is completed, limit noise analysis to the projected noise contours from the approved Airport Master Plan given that these noise contours are based on operations that would be 70% higher than the FAA’s Terminal Area Forecast operations for 2040.
9. Figure 2	Single event noise contour does not justify the basis of the chosen aircraft or specify the flight performance characteristics used to prepare the noise contour.	Remove Figure 2 as this is an unsubstantiated and subjective metric that is not approved under federal law for noise planning and land use compatibility purposes.
10. Section 4.3.2.3.a and b	Infill does not normally require that the property be bounded on “all sides” by similar uses. “Noise sensitive uses” category is not defined.	Revise to state, “...bounded on two sides...or approved for future development through a Specific Plan found to be consistent by the Airport Land Use Commission or by the local jurisdiction in compliance with Public Utilities Code section 21670 et seq.” Revise to address extending perimeter of extremely sensitive noise uses versus all uses.
11. Section 4.3.2.4	See #6 above	See #6 above

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12. Section 4.3.2.5	See #6 above	See #6 above
13. Section 4.3.2.6.a and .b	Definitions for “Area of Demonstrated Noise Incompatibility” are arbitrary and capricious. These definitions take no facts into account when defining noise incompatibility such as actual noise readings, disclosure to property owners, etc	Make all necessary revisions to ALUP to be consistent with federal law, California law and the Caltrans Handbook guidelines.
14. Section 4.3.3	Text and Table 4 referencing less than 65 dB CNEL are not supported by federal law, State law and the Caltrans Handbook guidelines for noise compatibility.	Make all necessary revisions to ALUP to be consistent with federal law, California law and the Caltrans Handbook guidelines.
15. Section 4.3.4	Noise policies and Table 5 referencing less than 65 dB CNEL are not supported by federal law, State law and the Caltrans Handbook guidelines for noise compatibility	Make all necessary revisions to ALUP to be consistent with federal law, California law and the Caltrans Handbook guidelines. Policy N-4 – same comments as #13 above.
16. Section 4.4.2.3	Reserve Space should include concept of open space easements and property.	Redefine Reserve Space to reflect the desire to retain areas of open land around the airport. This should recognize areas that are secured through open space easements in addition to the other low intensity uses listed.
17. Section 4.4.3 and Figure 3	Figure 3 and the associated references are inconsistent with the methodology established in the Caltrans Handbook for establishing safety zones and reflecting the fact that aviation safety risk is higher close to the runway ends and along the runway centerlines extended. SBP Airport is similar to and consistent with the safety profile of other regional airports in California of similar size and activity. Figure 3 has also been found by the City and the ALUC to be geographically incorrect relative to the runways and the surrounding land uses.	Revise Figure 3 to properly depict safety zones relative to the Runways 11-29 and 7-25 consistent with the FAA-approved ALP. Revise Figure 3 to eliminate Safety Zones S-1b and S-1c as these zones are inconsistent with the methodology set forth in the Caltrans Handbook and do not reflect the actual safety risk in the airport vicinity. Revise Figure 3 to modify Safety Zone S-2 to be consistent with the definition for Zone 6 – Traffic Pattern as defined in the Caltrans Handbook.
18. Section 4.4.4.1.c	Sentence 2 incorrectly states, “It is likely, however, that future airport operations will see an increase in the use of Runway 7-25 as a means of increasing the flow of traffic during peak periods.”	Properly characterize Runway 7-25 consistent with its purpose and use on the Airport as a limited-use runway specifically for small aircraft during wind conditions favoring Runway 7-25. Arrivals, departures and closed traffic patterns use the airspace corridors associated with Runway 11-29 even when landing or departing Runway 7-25.
19. Section 4.4.4.2.b	Safety Area S-1b is inconsistent with the methodology established in the Caltrans Handbook for establishing safety zones and reflecting the fact that aviation safety risk is higher close to the runway ends and along the runway centerlines extended. Potential aviation safety hazards stated in this section to not translate into higher safety risk in the areas encompassed by Safety Area S-1b	Eliminate Section 4.4.4.2.b.
20. Section 4.4.4.2.c	Safety Area S-1c is inconsistent with the methodology established in the Caltrans Handbook for establishing safety zones and reflecting the fact that aviation safety risk is higher close to the runway ends and along the runway centerlines extended. Potential aviation safety hazards stated in this section to not translate into higher safety risk in the areas encompassed by Safety Area S-1c	Eliminate Section 4.4.4.2.c.

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21. Section 4.4.5	Density adjustment section is confusing and complicated. Table 6 and Figure 4 refer to reserve space/area interchangeably and there is some confusion regarding more restrictive requirement area within reserve space/area.	Update to simplify criteria by which ALUC will consider proposals that involve clustered development and open areas in perpetuity as means to address potential density adjustments. Eliminate overlapping provisions for DAP, CDZ, ACOS and simplify concept of allowing greater density or uses where development has been concentrated in areas less susceptible to noise/safety issues when accompanied by areas of open space.
22. Section 4.4.6	Tables 7 and 8 and associated Figures 6, 7 and 8 reflect unreasonable planning requirements for residential development in Airport Safety Areas S-1b, S-1c and S-2.	Revise Tables 7 and 8 and associated Figures 6, 7 and 8. Use Table 4E of the Handbook to determine typical intensities of non-residential uses; and replace all density restrictions in S-2 with airport influence area disclosure.
23. Section 4.5.2.1	Figures 9 and 10 are inconsistent with FAR Part 77 and actual overflight patterns.	Update Figures 9 and 10 to be consistent with updated AIA as suggested in Comment #13. Update Figure 10 to properly depict instrument arrival and departure paths consistent with actual overflight corridors.
24. Section 5.1	Intended use prohibits development of noise sensitive uses in “an acoustic environment substantially similar to an area of demonstrated noise incompatibility”. Definitions for “Area of Demonstrated Noise Incompatibility” are arbitrary and capricious. These definitions take no facts into account when defining noise incompatibility such as actual noise readings, disclosure to property owners, etc	Make all necessary revisions to ALUP to be consistent with federal law, California law and the Caltrans Handbook guidelines.
25. Section 5.3	Land Use Compatibility Table for both noise and aviation safety areas summarize policies and land use restrictions identified in previous comments.	Update Land Use Compatibility Table consistent with suggested changes to corresponding policies and land use restrictions identified in previous comments.
26. Section 6	Section 6 is inconsistent with noise and safety standards contained in the Caltrans Handbook, State law and federal law and guidelines.	Remove reference to MASP. City will make changes to MASP in response to updated ALUP safety zones and revised noise contours consistent with reasonable forecast of aviation operations.
27. Section 7.5.b	State law has changed to only require a two-thirds vote of a quorum of its members.	Revise text to insert, “...overrule the ALUC’s determination by at least a two-thirds vote <b><u>of a quorum</u></b> of its members...”
28. ACOS Plan	See comments on #21.	See comments on #21.